

Andrew T. Solomon (AS 9200)
Gretchen S. Silver (GS 1534)
SULLIVAN & WORCESTER LLP
1290 Avenue of the Americas, 29th Fl.
New York, NY 10104
(212) 660-3000

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
PROFESSIONAL OFFSHORE	:	
OPPORTUNITY FUND, LTD., a company	:	08-CIV-3767 (DC)
registered under the laws of the British	:	
Virgin Islands,	:	
	:	REQUEST
	:	<u>TO ENTER DEFAULT</u>
Plaintiff,	:	
	:	
-against-	:	ECF CASE
	:	
FRANKLIN TOWERS ENTERPRISES,	:	
INC., a Nevada Corporation,	:	
	:	
Defendant.	:	
-----	X	

TO: J. Michael McMahon, Clerk of the Court
United States District Court
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Please enter the default of Defendant Franklin Towers Enterprises, Inc., pursuant to Fed.R.Civ. 55(a), for said Defendant's failure to plead or otherwise defend against the claims asserted against Defendant in the Complaint by Plaintiff Professional Offshore Opportunity Fund, Ltd. as shown from the attached Affidavit of Andrew T. Solomon in Support of Entry of Default.

Dated: New York, NY
June 16, 2008

SULLIVAN & WORCESTER LLP

By: s/Gretchen Silver
Andrew T. Solomon (AS 9200)
Gretchen S. Silver (GS 1534)
1290 Avenue of the Americas
29th Floor
New York, NY 10104
(212) 660-3000

*Attorneys for Plaintiff Professional Offshore
Opportunities Fund, Ltd.*

Andrew T. Solomon (AS 9200)
Gretchen S. Silver (GS 1534)
SULLIVAN & WORCESTER LLP
1290 Avenue of the Americas, 29th Fl.
New York, NY 10104
(212) 660-3000

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PROFESSIONAL OFFSHORE
OPPORTUNITY FUND, LTD., a company
registered under the laws of the British
Virgin Islands,

Plaintiff,

-against-

FRANKLIN TOWERS ENTERPRISES,
INC., a Nevada Corporation,

Defendant.

[illegible]

ANDREW T. SOLOMON, being duly sworn, deposes and says:

1. I am an attorney admitted to practice before this court and counsel to Plaintiff in this action, and base this affidavit upon personal knowledge and files maintained by Sullivan & Worcester LLP in this action.

2. The Plaintiff Professional Offshore Opportunity Fund, Ltd. on April 21, 2008, filed in this action a Summons and Complaint.

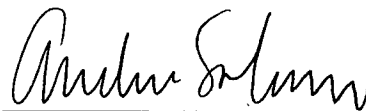
3. A Summons and a copy of the Complaint were served upon the Defendant Franklin Towers Enterprises, Inc. on May 16, 2008. The affidavit of service verifying service upon the Defendant was filed on June 6, 2008, a copy of which is attached as Exhibit A.

4. More than 20 days have elapsed since the date on which the Defendant Franklin Towers Enterprises, Inc. was served with Summons and a copy of the Complaint.

5. Defendant Franklin Towers Enterprises, Inc. has failed to answer or otherwise defend as to Plaintiff Professional Offshore Opportunity Fund, Ltd.'s Complaint, or serve a copy of any answer or other defense it may have had, upon Sullivan & Worcester LLP, attorneys of records for Plaintiff.

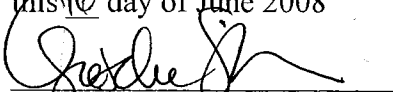
6. This affidavit is executed by me in accordance with Rule 55(a) of the Federal Rules of Civil Procedure, for the purpose of enabling the Plaintiff to obtain an entry of default against the Defendant, for its failure to answer or otherwise defend as to the Plaintiff's Complaint.

7. Therefore, I respectfully request that the Court enter a default against Defendant Franklin Towers Enterprises, Inc. in the within matter. A proposed Clerk's Certificate is attached hereto as Exhibit B.



Andrew T. Solomon

Sworn to before me
this 16th day of June 2008


Notary Public

GRETCHEN SILVER
Notary Public, State of New York
No: 02SI6184843
Qualified in Queens County
Commission Expires April 07, 2012

EXHIBIT A

AFFIDAVIT OF SERVICE

CASE NO. 08 CIV 3767

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT, NV STATE OF NEVADA

Professional Offshore Opportunity Fund, Inc.

Plaintiff(s)/Petitioner(s)

VS

Franklin Towers Enterprises, Inc.

Defendant(s)/Respondent(s)

County of CLARK, State of NEVADA

Jeannie Smith, being duly sworn deposes and says: That at all times herein affiant was and is a citizen of the United States, over 18 years of age, licensed to serve civil process in the State of Nevada under license #604, and not a party to or interested in the proceeding in which this affidavit is made. On

May 16, 2008 at 1:50 PM at Resident Agent, Eastbiz.com, Inc., 5348 Vegas Dr., Las Vegas, NV 89108

affiant served the within:

Rule 7.1 Statement**Letter****Summons in a Civil Action****Complaint**

UPON: Franklin Towers Enterprises, Inc., Defendant
(herein called recipient) therein named.

☐ INDIVIDUAL by delivering a true copy of each to said recipient personally.

☒ CORPORATION A Nevada corporation, by delivering thereat a true copy of each to Richard Teausaw personally, affiant knew said corporation so served to be the corporation, described in same as said recipient and knew said individual to be Authorized Employee thereof.

☐ SUITABLE AGE PERSON by delivering a true copy of each to _____ a person of suitable age and discretion. Said premises is recipient's [] actual place of business [] dwelling house (usual place of abode) within the state.

☐ AFFIXING TO DOOR by affixing a true copy of each to the door of said premises, which is recipient's [] actual place of business [] dwelling house (usual place of abode) within the state. Affiant was unable, with due diligence to find recipient or a person of suitable age and discretion, having attempted as follows:

Day _____ Date _____ Time _____ Day _____ Date _____ Time _____
Day _____ Date _____ Time _____ Day _____ Date _____ Time _____

☐ MAILING COPY Affiant caused a copy of same to be enclosed in a first class postpaid sealed wrapper properly addressed to recipient at recipient's last known [] residence [] place of employment at:

☐ and caused said wrapper to be deposited in a post office official depository under exclusive care and custody of the U. S. Postal Service within the State of Nevada on _____
[] The above mailing was made by certified mail (Receipt No. _____).

☒ DESCRIPTION A description of the Defendant, or other person served, or spoken to on behalf of the Defendant is as follows:

Sex Male Color of skin White Color of hair Brown Approx. Age 51 - 65 Yrs.
Approx. Height Over 6' Approx. weight Over 200 Lbs. Other _____

☐ WITNESS FEES \$ _____ the authorizing traveling expenses and one day's witness fee was paid (tendered) to the recipient.

☐ PHOTO Affiant was able to identify recipient from annexed photo.

☐ MILITARY SERVICE To the best of my knowledge and belief, said person engaged in the US Military at the time of service.

Subscribed and sworn to before
me this _____ day of _____, 2008

Notary Public

Jeannie Smith
Affiant - Jeannie Smith
Legal Process Service, Lic. 604

EXHIBIT B

Andrew T. Solomon (AS 9200)
Gretchen S. Silver (GS 1534)
SULLIVAN & WORCESTER LLP
1290 Avenue of the Americas, 29th Fl.
New York, NY 10104
(212) 660-3000

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----	X	
	:	
PROFESSIONAL OFFSHORE	:	
OPPORTUNITY FUND, LTD., a company	:	08-CIV-3767 (DC)
registered under the laws of the British	:	
Virgin Islands,	:	<u>CLERK'S CERTIFICATE</u>
	:	
Plaintiff,	:	ECF CASE
	:	
-against-	:	
	:	
FRANKLIN TOWERS ENTERPRISES,	:	
INC., a Nevada Corporation,	:	
	:	
Defendant.	:	
-----	X	

I, J. MICHAEL MCMAHON, Clerk of the United States District Court for the Southern District of New York, do hereby certify that this action commenced on April 21, 2008 with the filing of a Summons and Complaint. On May 16, 2008, a Summons and a copy of the Complaint was served on Defendant by personally serving Eastbiz.com, Inc., the registered agent for service of process for the Defendant, at 5348 Vegas Dr., Las Vegas, NV 89108, and proof of such service thereof was filed on June 6, 2008.

I further certify that the docket entries indicate that the Defendant has not filed an answer or otherwise moved with respect to the Complaint herein. The default of the Defendant is hereby noted.

Dated: New York, New York

J. MICHAEL MCMAHON
Clerk of the Court

By:

Deputy Clerk